



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

RICK SNYDER  
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STATE SUPERINTENDENT

December 17, 2013

Deborah Delisle  
Assistant Secretary for Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, DC 20202

Dear Assistant Secretary Delisle:

I am writing on behalf of the Michigan Department of Education (MDE) and local educational agencies (LEAs) in Michigan that receive funds under Title III, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). Michigan is requesting a waiver for school year 2013-2014 of the requirement in section 3122(b)(1) of the ESEA for Annual Measurable Achievement Objective #1 (AMAO #1) only, which is the measure of progress of children in attaining English proficiency (section 3122(a)(3)(A)(i) of the ESEA). Michigan would still make AMAO #2 and AMAO #3 determinations for 2013-2014. This waiver request is only for AMAO #1, and only for the one year while transitioning between the Michigan English Language Proficiency Assessment (MI-ELPA) to the World-Class Instructional Design and Assessment (WIDA). Specifically, the MDE is seeking approval for this waiver to allow LEAs within Michigan to be exempt from accountability for AMAO #1 determination during the transition year (the 2013-2014 school year) to the new WIDA assessments.

Michigan believes that the requested waiver will increase the quality of instruction for students and improve the academic achievement of students by transitioning to WIDA. WIDA summative assessments are aligned to Michigan's reading and mathematics content standards as it relates to academic language proficiency.

Our rationale for requesting a waiver for AMAO #1 includes that the constructs on which the MI-ELPA and WIDA summative assessments are built are significantly different. MI-ELPA items are based on the Michigan English Language Proficiency (ELP) Standards. These standards are primarily focused on fostering skills appropriate for an English language arts classroom and for social and instructional language development. The WIDA summative assessments, however, are linked to the WIDA English Language Development (ELD) standards. The primary focus of

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the WIDA ELD standards is that of academic language across content areas such as language arts, mathematics, science, and social studies. WIDA assessments measure significantly different constructs than the MI-ELPA assessments because they are developed based on significantly different sets of standards.

Additionally, the MI-ELPA scale scores and the scale scores for WIDA assessments are very different. Every year, all new operational items on MI-ELPA are calibrated and equated to the base scale using a content and psychometrically representative anchor set. Due to this representativeness requirement, all domains have representative items acting as anchor items for equating purposes. However, the scale scores for the WIDA ACCESS for ELs are created differently. First, the vertical scales of the Writing and Speaking domains on the WIDA ACCESS for ELs are calibrated using items from the Reading and Listening domains as anchor items respectively. Thus at least the anchor set for Writing and Speaking are not content and psychometrically representative items from the same domain. Second, MI-ELPA calibrates all items (across all four domains) simultaneously while WIDA ACCESS for ELs calibrates items domain by domain and then weights are applied to obtain the overall scale scores. Third, even though the MI-ELPA calibration does not involve weights to obtain the overall scale scores, equal weighting is implied. However, for WIDA ACCESS for ELs, domains are weighted differently, i.e., Reading and Writing are weighted 35% each, while Listening and Speaking are weighted 15% each. All these differences in equating, calibration, and scale creation make it impossible to assume that a reasonable, valid and constant relationship between the two scales across all points can be established. For detailed information on these differences, please refer to the attached comparison table.

Due to the above mentioned reasons (i.e., different content standards and constructs, as well as different scaling procedures for the two assessments), it is impossible for a bridge study to produce meaningful or valid linking relations between the MI-ELPA and the WIDA ACCESS for ELs, especially when the growth computation (AMAO #1) using the linking results is the focus and purpose for such a study. Therefore, we strongly argue against the need for conducting such a bridge study.

Michigan is aware that a similar waiver request was submitted by Wyoming in 2011 and was granted, following a review of the state's specific circumstances and rationale. Prior to submitting this waiver request, Michigan provided all local and intermediate school district superintendents, public school academy directors and local Title III directors in the state with notice and a reasonable opportunity to comment on this request. See Attachment A. Copies of all these comments are included in Attachment B. Michigan has also provided notice and information regarding this waiver request to the public in the manner in which the State customarily provides such notice and information to the public, by posting information regarding the waiver request on its website Attachment C. Copies of all public comments that Michigan received in response to this notice are included in Attachment D.

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Please feel free to contact Shereen Tabrizi, Ph.D. at phone 517-373-9524 or [tabrizis@michigan.gov](mailto:tabrizis@michigan.gov) if you have any questions regarding this request. Thank you for your consideration.

Sincerely,



Venessa Keesler, Ph.D.  
Deputy Superintendent, Education Services

enclosures

cc: Monique Chism, Director  
Student Achievement and School Accountability Programs

DRAFT

**Michigan Department of Education**  
Differences between WIDA ACCESS for ELLs and ELPA  
on Scaling, Equating, and Calibration

**Same:**

- (1) Both are vertical scales, spanning from Kindergarten to grade 12.
- (2) Both tests have four domains: Listening, Reading, Writing, and Speaking.
- (3) Fixed parameter approach was used to calibrate new items onto the same scale of anchor items.
- (4) Speaking items were individually administered and scored at administration.

**Different:**

Aspects	WIDA ACCESS for ELLs	MI ELPA
Comprehension Scale Score	<p>= 70% Reading + 30% Listening</p> <p>Ranges from 100 to 600.</p> <p>Note that 350 was chosen to be an interpretive center point across domains and composites. This score represents the cut between Level 3 (Developing) and Level 4 (Expanding) for the grades 3-5 cluster.</p>	<p>Only selected items from Listening and Reading are considered as contributing to Comprehension.</p> <p>Fixed parameter approach was used to get raw to measure relation and then linear transformation was used to get a two digit scale score which ranges from 30 to 81 (this range also applies to other domains).</p> <p>No specific center was chosen either for domain (2 digits) or overall scale score (3 digits).</p>
Overall Scale Score	<p>= 35% Reading + 35% Writing + 15% Listening + 15% Speaking, with each domain calibrated separately, also ranges from 100 to 600 (the same range applies to each domain scale score as well).</p>	<p>All domains calibrated concurrently, and the resulting raw to measure relations are linearly transformed to be the overall scale score ranges from 300 to 801.</p>
Vertical Scale	<p>For Listening and Reading, common item equating design (across tiers within grade-level clusters and across grade-level clusters) was used in the first year, and concurrent calibration across grade levels was used.</p>	<p>ELPA did not conduct its own vertical scaling study. In the very first year of the ELPA administration, through the use of fixed parameter approach, all ELPA items were placed onto the existing SELP vertical scale.</p>

	For Writing and Speaking in the first year, no common items across grade level clusters were used. Instead, Listening was used as anchor set for calibrating Speaking, and Reading was used as anchor set for calibrating Writing.	Concurrent calibration was used for each grade cluster for items across the four domains combined.
Speaking	Speaking items were scored dichotomously.	Speaking items were scored polytomously.
Each Domain Scale Score	Due to the need for computing weighted composite, procedures are taken to make sure each domain has exactly the same SD on the scale score scale.	There is no need to worry about the same SD across domain scale scores, as no weights were used for composites. All composite scores were obtained by fixed parameter calibration.
Field Test Administration	Stand-alone field test administration to voluntary larger districts from across the WIDA Consortium states.	Field test were embedded in the operational test forms.
Equating and Conversion table making	Based on 1,000 students (per form) rather than the entire population	Based on majority of the students (and in later years, almost the total population), which is much larger than the 1,000 sample size.